

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

for the

MAR - 6 2019

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

1. Joan Alejandro ARMENDARIZ-Fuentes (1983/MX)
2. Claudia Vanessa ARIAS-Torres (1992/MX)
3. Mario Gerardo ELLIARD-Garcia (1984/MX)
4. Karla Yuliana HERNANDEZ-Dominguez (1984/MX)
5. Alfonso TORRES Jr. (1995/US)

Defendant(s)

Case No. *M-19-0539-M*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 5, 2019 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC § 846

Offense Description

Conspiracy to Possess with Intent to Distribute a Controlled Substance /
 Approximately 5.04 Kilograms of Cocaine, a Schedule II Controlled
 Substance.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved by

Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/06/2019*8:51 am*

Judge's signature

City and state: McAllen, Texas

U.S. Magistrate Judge Peter Ormsby

Printed name and title

Attachment A

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On March 5, 2019, Joan Alejandro ARMENDARIZ-Fuentes (hereinafter ARMENDARIZ) and Claudia Vanessa ARIAS-Torres (hereinafter ARIAS) entered the United States from Mexico at the Pharr Port of Entry in Pharr, Texas, driving a vehicle. ARMENDARIZ drove, with ARIAS as the passenger, to the Walmart in Mission, Texas where he parked the Caliber.
2. After ARMENDARIZ parked the Caliber, Mario Gerardo ELLIARD-Garcia (hereinafter ELLIARD) was dropped off at Walmart by Karla Yuliana HERNANDEZ-Dominguez (hereinafter HERNANDEZ). ELLIARD took possession of the Caliber and drove the Caliber to a residence in McAllen, Texas.
3. Homeland Security Investigations (HSI) Special Agents and Task Force Officers went to the residence, where a search was later conducted. During the search of the residence, a bag containing approximately 5.04 kilograms of a white powdery substance which field tested presumptive positive for cocaine were discovered in the Caliber.
4. After cocaine was discovered in the Caliber, HSI Task Force Officers located and detained ARMENDARIZ and ARIAS at Walmart.
5. HSI Special Agents and Task Force Officers conducted a controlled delivery of cocaine to a business in McAllen, Texas, where Alfonso TORRES Jr. (hereinafter TORRES) took possession of the bag containing cocaine. TORRES was subsequently arrested.
6. HSI Special Agents interviewed ARMENDARIZ and ARIAS who stated they suspected the Caliber contained drugs and that an individual was to pick up their vehicle while they shopped.
7. HSI Special Agents interviewed HERNANDEZ who gave a false statement about where she dropped ELLIARD off to pick up the Caliber, gave evasive answers and then terminated the interview.
8. HSI Special Agents interviewed ELLIARD who stated he knew the Caliber contained what he suspected to be cocaine and admitted to prior cocaine smuggling events. HSI Special Agents had observed the prior drug smuggling events referenced by ELLIARD within the past few weeks while on surveillance and observed HERNANDEZ transporting ELLIARD to pick up load vehicles and assisting him in the prior drug smuggling events.
9. HSI Special Agents interviewed TORRES who stated he knew he was picking up cocaine on behalf of another individual.